

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 2:15-CV-11946-GCS-RSW
)	
v.)	
)	
JACK V. GIACALONE,)	
)	
Defendant.)	

INTERROGATORIES TO JUDGMENT DEBTOR JACK V. GIACALONE
BY JUDGMENT CREDITOR UNITED STATES OF AMERICA

Pursuant to Rules 69 and 33 of the Federal Rules of Civil Procedure, the judgment creditor, the United States of America, propounds the following interrogatories to judgment debtor Matthew Stein to be answered timely, fully, separately, in writing and under oath within thirty (30) days of service of the Interrogatories.

INSTRUCTIONS

1. If the answer to any interrogatory is fully and fairly contained in a document, from which the answer can without unreasonable difficulty be extracted, you may answer the interrogatory by attaching a copy of such document.

2. The answers to these interrogatories shall be supplied by:
mailing the original signed answers on or before February 19, 2018. If sending by U.S. Postal service, please send to: Philip Doyle, Trial Attorney, Tax Division, U.S. Department of Justice, Ben Franklin Station, P.O. Box 310, Washington, D.C. 20044. If sending by FedEx or UPS delivery, send to: Philip Doyle, Trial Attorney, U.S. Department of Justice, 555 4th Street NW, Room 6917, Washington, D.C. 20001.



DEFINITIONS

The term “you,” “yourself,” and “your” shall refer to Jack V. Giacalone.

INTERROGATORIES

1. Please identify your monthly personal expenses:
 - A. Food \$ _____
 - B. Clothing \$ _____
 - C. Household Supplies and
Personal care products \$ _____
 - D. Minimum payment on credit cards \$ _____
 - E. Housing and utilities \$ _____
 - F. Vehicle loan or lease \$ _____
 - G. Vehicle operating costs \$ _____
 - H. Public transportation costs \$ _____
 - I. Health insurance premiums \$ _____
 - J. Out-of-pocket health care costs \$ _____
 - K. Alimony and child support \$ _____
 - L. Other court-ordered payments \$ _____
 - M. Life insurance premiums \$ _____
 - N. Current taxes \$ _____
 - O. Other expenses (please identify) \$ _____

2. Have you ever owned or ever had any interests in any business entity from January 1, 2004 to the present? (Business entities include, but are not limited to associations, corporations, limited liability companies, partnerships, proprietorships or other similar entities.) Provide the following information for each business entity:

- (a) name and address;**
- (b) date of formation (incorporation);**
- (b) type of entity;**
- (c) your role (owner, partner, board member, interest, etc);**
- (d) your percentage of ownership/interest;**
- (e) the names of other key individuals involved in the business entity (This includes, but is not limited to other owners, partners, and individuals with interest in the entity); and**
- (f) purpose of entity.**

3. Please identify all of the properties where you have resided since January 1, 2004, and for each include:

(a) the complete mailing address for each residence;

(b) the dates at which you resided there; and

(c) the name and address of the owner of each residence. If you do not (or did not) own the property, please state who owned the property and the amount of monthly rent you paid.

4. Have you, or any business entity identified in Interrogatory No. 2, ever owned an interest in any house, apartment, condominium, building, land or other real property since January 1, 2004? If so, please set forth the following information regarding each such property:

- (a) address;**
- (b) description;**
- (c) use (primary residence, commercial/business property, vacation home, rental property, etc.); and**
- (d) if you, or the business entity, have disposed of the interest in the real property, the date on which the interest was disposed of, the person or entity to whom the interest was conveyed, your relationship to that person or entity, and the consideration received for the interest.**

5. For each property identified in Interrogatory No. 4, above, identify (by name and address) every bank, mortgage company, or other lender which has played any role in the acquisition or ownership of each identified property interest. (This includes, but is not limited to loans, mortgages, lines of credit, refinancing arrangements, or any other financial instruments that facilitated your acquisition, ownership, or interest in any property.)

6. Have you transferred, conveyed or disposed of any cash, property, assets or other items of value with a cost or fair market value over \$10,000 from February 27, 2013, to the present? If so, provide the following information for each such item:

- (a) description of the property;
- (b) date of transfer;
- (c) fair market value of property when transferred;
- (d) name and address of transferee; and
- (e) your relation to transferee.

7. Do you or any entity identified in response to Interrogatory No. 2 own or lease any vehicle, or pay for the use of a vehicle owned or leased by someone else? If so, please identify the person or entity which owns or leases the vehicles and set forth the following information:

For owned vehicles:

Make	Model	Year	VIN	Indebtedness	Liquidation Value
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For leased vehicles:

Make	Model	Year	Monthly Lease Payment	Name and address of Lessor
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8. If you established, transferred assets to, or are a beneficiary or trustee of a trust or an estate, please provide the following information:

- (a) the name of the trust or estate;
- (b) the value of the assets of the trust or estate and a description of those assets;
- (c) the value of your interest in the trust or estate;
- (d) amounts received by you from the trust or estate; and
- (e) names and addresses of the settlor or creator, the trustee(s), and the beneficiaries of any such trust.

9. Identify every bank and other financial institution (including foreign banks and financial institutions) with which you, or any entity identified in response to Interrogatory No. 2, have done business or for which business was done on your behalf at any time since January 1, 2004.

For each bank or other financial institution:

(a) state the account number of every account, including but not limited to savings accounts, checking, money market, or mutual fund accounts in which you have had an interest or upon which you have had the authority to sign checks or make withdrawals;

(b) state whether the bank or financial institution has made any loans to you or the entity within the past five years and, if so, the amount and date of each loan, and whether you submitted a financial statement in applying for the loan;

(c) state whether you have a safety deposit box in your name or in any other name, including the names of any entity. If so, state the address of the branch at which the safety deposit box is maintained, the name and address of the person under whose name the box is rented, and list and describe in detail the contents of the box as of the date on which these interrogatories were served; and

(d) identify all credit cards, debit cards, stored value cards and/or automatic teller ("ATM") cards you use or control, by stating (1) the name on the card; (2) the name and address of the financial institution that issued the card and type of card (*e.g.*, VISA, MasterCard, American Express, etc.); and (3) the account number.

10. Please furnish the following financial information, as of January 15, 2018, concerning both you and any entity identified in response to Interrogatory No. 2:

	<u>Assets</u>	<u>Cost</u>	<u>Fair Market Value</u>
(1)	cash		
(2)	cash surrender value of insurance		
(3)	accounts receivable		
(4)	notes receivable		
(5)	furniture and fixtures		
(6)	automobiles		
(7)	stocks, bonds, or other securities		
(8)	bitcoins or other electronic currency		
(9)	other personal property over \$1,000 in fair market value		
	<u>Liabilities</u>	<u>Amount</u>	
(1)	accounts payable		
(2)	notes payable		
(3)	mortgages		
(4)	judgments		
(5)	other		

11. Have you, or any entity identified in response to Interrogatory No. 2, ever owned or had any interest in any brokerage accounts, Individual Retirement Accounts, Stock Option Plans, pension or profit-sharing plans, or any other savings or retirement plans since January 1, 2004?

If so, provide the following information for each:

- (a.) identify the name, address, and phone number of the custodian;
- (b.) identify the account number(s);
- (c.) state the current value of the account(s); and
- (d.) if you no longer have an interest in the account(s), state when your interest was dissolved, why it was dissolved, the value of the account at the time it was dissolved, and to where the funds were transferred.

Dated: January 17, 2018

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General
Tax Division

By:



PHILIP DOYLE
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U.S. Department of Justice
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Washington, D.C. 20044
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DECLARATION

I declare under penalty of perjury that the foregoing answers to interrogatories are true and correct. Executed this _____ day of _____, 2018.

JACK V. GIACALONE

CERTIFICATE OF SERVICE

I certify that the **INTERROGATORIES TO JUDGMENT DEBTOR JACK V. GIACALONE BY JUDGMENT CREDITOR UNITED STATES OF AMERICA** was served on January 17, 2018, by prepaid U.S. First Class Mail, to the following:

Mary A. Mahoney
Schwartz Law Firm, P.C.
37887 West Twelve Mile Road, Suite A.
Farmington Hills, MI 48331

And by email to:

mmahoney@schwartzlawfirm.com



PHILIP DOYLE
Trial Attorney
U.S. Department of Justice, Tax Division